

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION**

FILED '25 APR 21 AM 9 28 MDGA-COL

4:25-cv-130 (COL)

**To the Honorable Judges of the United States District Court for the Middle District of Georgia, Columbus Division:**

**Subject:** Complaint and Motion for Injunctive Relief Against WebMD for Patent Infringement and Misappropriation of Trade Secrets\*\*

**Case Caption:** Doctor Ai LLC v. WebMD, LLC

**Case Number:**

**COMPLAINT**

**Plaintiff:**

Doctor Ai LLC

By: /s/ Azad Kabir

Azad Kabir, M.D. MSPH

Founder and Managing Member

Doctor Ai LLC

**Business Address:**

1120 Beach Blvd

Biloxi, MS 39530

Cell: 228 342-6278

**Defendant:**

WebMD, LLC

909 North Pacific Coast Highway, 11th Floor

El Segundo, CA 90245

**I. INTRODUCTION**

Plaintiff, Azad A Kabir, MD MSPH, files this Complaint against Defendant, WebMD, LLC, for patent infringement and trade secret misappropriation. This action arises under the patent laws of the United States, 35 U.S.C. § 271, and the Defend Trade Secrets Act (DTSA), 18 U.S.C. § 1836. Plaintiff seeks damages, injunctive relief, and all other appropriate remedies to address Defendant's willful infringement and unlawful conduct.

## **II. JURISDICTION AND VENUE**

1. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question jurisdiction) and 28 U.S.C. § 1338(a) (jurisdiction over patent and trade secret claims).
2. Venue is proper in this district under 28 U.S.C. § 1400(b) because Defendant conducts substantial business in this area and has purposefully availed itself of the benefits of this forum.
3. This Court has personal jurisdiction over Defendant because Defendant regularly conducts business in Georgia, including offering its "Symptom Checker" tool to residents of this district.

## **III. FACTUAL ALLEGATIONS**

1. Plaintiff is the proprietary owner of U.S. Patent No. US11,972,865 B1, titled "High Probability Differential Diagnoses Generator And Smart Electronic Medical Record," which relates to innovative technology for generating differential diagnoses based on patient symptoms.
2. Plaintiff's technology incorporates proprietary methods and a unique database essential to its functionality.
3. In 2018, Plaintiff engaged a third-party engineering firm, THOUGHTi LLC, to perform specific tasks requiring access to Plaintiff's proprietary database. THOUGHTi LLC's personnel, including its CTO, Nilesh Patkar, were granted access under strict non-disclosure agreements (NDAs).
4. In 2020, Plaintiff discovered striking similarities between its patented technology and Defendant's "Symptom Checker" tool.
5. Evidence indicates that Defendant unlawfully accessed Plaintiff's proprietary database through THOUGHTi LLC and used it to enhance its "Symptom Checker" tool, as suggested by correspondence from THOUGHTi LLC personnel.
6. Defendant's "Symptom Checker" tool generates revenue by driving traffic to its platform, directly infringing on Plaintiff's patented methods and causing competitive harm.

## **IV. LEGAL CLAIMS**

### **Count 1: Patent Infringement (35 U.S.C. § 271)**

1. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
2. Defendant's "Symptom Checker" tool incorporates methods covered by Plaintiff's U.S. Patent No. US11,972,865 B1 without authorization.
3. Defendant's infringement is willful and intentional, causing Plaintiff substantial and irreparable harm.

4. Plaintiff is entitled to relief including injunctive relief, damages, and enhanced remedies under 35 U.S.C. §§ 283–285.

#### **Count 2: Copyright Infringement (17 U.S.C. § 501 et seq.)**

1. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
2. Plaintiff is the creator and owner of a unique and original database containing over 2,200 clinical features cross-referenced with more than 15,000 diagnoses, developed between 2011 and 2024.
3. The compilation, structure, and content of this database constitute original works of authorship subject to copyright protection under U.S. law.
4. Defendant unlawfully accessed, copied, and utilized Plaintiff's copyrighted material in developing and deploying its "Symptom Checker" tool without license, permission, or other legal right.
5. Defendant's infringement has caused Plaintiff significant economic damage and undermines the commercial value of the copyrighted work.

#### **Count 3: Trade Secret Misappropriation (18 U.S.C. § 1836)**

1. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
2. Plaintiff's proprietary database and methods constitute trade secrets under the Defend Trade Secrets Act (DTSA).
3. Defendant misappropriated these trade secrets through unauthorized access and use, resulting in unjust enrichment and irreparable harm to Plaintiff.

#### **Proper Joinder**

1. This Court has subject matter jurisdiction over all claims, and venue is proper.
2. Pursuant to Federal Rules of Civil Procedure 18(a) and 20, all claims arise from the same series of transactions and occurrences, share common questions of law and fact, and involve the same parties.
3. Accordingly, joinder of the patent infringement, copyright infringement, and trade secret misappropriation claims in a single action is proper.

## **V. REQUESTED RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

1. Issue a permanent injunction enjoining Defendant from further infringing Plaintiff's patent and misappropriating Plaintiff's trade secrets.
2. Award compensatory damages, including reasonable royalties and lost profits, for Defendant's infringement and misappropriation.
3. Award treble damages under 35 U.S.C. § 284 due to Defendant's willful infringement.
4. Award punitive damages for Defendant's trade secret misappropriation under the DTSA.
5. Award pre-judgment and post-judgment interest.
6. Award Plaintiff reasonable attorney's fees and costs.
7. Grant such other and further relief as this Court deems just and proper.

## **VI. JURY DEMAND**

Plaintiff demands a trial by jury on all issues so triable.

**Respectfully submitted,**



Doctor Ai LLC

By: /s/ Azad Kabir

Azad Kabir, M.D. MSPH

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**Date:**